

Declaration

Facility Identification

HAAF is a former military installation located on a diked and subsided bayfront parcel in the City of Novato, California. A perimeter levee excludes tidal waters from the inboard area of the former installation. The 644-acre Main Airfield Parcel and other parts of HAAF were identified for closure under the Base Realignment and Closure Act of 1988 (BRAC). Ten acres of the parcel lie outboard of the perimeter levee in the coastal salt marsh. The remaining portion of the coastal salt marsh (approximately 78 acres) is located on property owned by the State Lands Commission (SLC). Some of the sites being addressed in this ROD/RAP extend beyond the Army BRAC property boundary onto property owned by SLC.

The Inboard Area was used for a variety of military functions. These functions were supported by underground storage tanks (UST), aboveground storage tanks (AST), transformers and transformer pads, storm drain and sanitary sewer systems, the Former Sewage Treatment Plant (FSTP) (including sludge drying beds), fuel lines, revetment areas, and the Perimeter Drainage Ditch (PDD), which collected runoff from the Base, as well as from some surrounding agricultural lands. Portions of the coastal salt marsh were used to support Department of Defense operations on the main airfield. Activities within the coastal salt marsh included emergency rescue operations in San Pablo Bay and disposal of construction debris. Transformers and transformer pads, a winch at the boat dock, and a burn pit at the East Levee Construction Debris Disposal Area (ELCDDA) supported these activities. Additional features of the coastal salt marsh include the Outfall Drainage Ditch (ODD), which receives stormwater runoff and drainage from the main airfield, and the FSTP Outfall, which received main airfield sanitary and industrial wastes from the FSTP.

Statement of Basis and Purpose

This Record of Decision/Remedial Action Plan (ROD/RAP) presents the environmental response actions to be taken by the Army BRAC restoration program and additional environmental assurances to be provided by actions that the Army Civil Works Program will take through the Hamilton Wetland Restoration Project (HWRP) to address potential risks associated with residual contaminants on the Main Airfield Parcel at HAAF and restoration of a wetland at HAAF.

For the Army, the term "environmental actions" relates to Army BRAC response actions and the environmental assurance actions by the Army Civil Works Program. The ROD/RAP evaluates sites located in the HAAF Main Airfield Parcel and adjacent coastal salt marsh owned by the California State Lands Commission (SLC). The Army BRAC program will perform the environmental response actions for the sites listed in Table D-1 in accordance with Executive Order 12580; the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA) (42 USC section 9601 et seq.); and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). These response actions will benefit the future land use plans for wetland restoration. The Army Civil Works program

through the HWRP, and in accordance with Section 101 (b)(3) of the Water Resources Development Act of 1999 (WRDA), will take actions to address the potential risks posed by Inboard Area-wide DDTs and polynuclear aromatic hydrocarbons (PAHs) in soils adjacent to the runway.

DTSC and the RWQCB (collectively, the "State") are regulating these environmental actions as environmental response actions in accordance with the provisions of California Health and Safety Code; this ROD constitutes a RAP subject to Chapter 6.8 of Division 20 of the California Health and Safety Code Section 25356.1. The RWQCB, with DTSC support, will be the lead state agency for oversight of the implementation of the ROD/RAP. The RWQCB, as authorized by the Porter Cologne Water Quality Control Act, will adopt site cleanup requirements (SCRs) that will ensure implementation of the final approved ROD/RAP. Through these SCRs, the State will ensure that agreed-upon environmental assurance actions are taken to address residual concentrations of Inboard Area-wide DDTs and PAHs in soils adjacent to the runway through the imposition of Waste Discharge Requirements (WDRs) governing the implementation of the HWRP.

Assessment of the Site

The alternatives selected in this document are necessary to protect public health and/or the environment from actual or threatened releases of hazardous substances, pollutants or contaminants from the Main Airfield Parcel, which may present a risk to human health or the environment.

Information supporting the alternatives selected in this document is contained in the project documents that are part of the Administrative Record. The Administrative Record listing is included as Appendix A to the ROD/RAP.

Environmental assessment activities within the Main Airfield Parcel were initiated by the Army in 1985 and continued through 2002. Environmental assessment activities in the coastal salt marsh included a confirmation study for hazardous waste, remedial investigations, biological testing data studies, and a human health and ecological risk assessment. Environmental assessment activities within the Inboard Area included remedial investigations, interim removal actions, and a human health and ecological risk assessment.

Description of Selected Remedy

The Army recommends Alternative 1, No Further Action, Alternative 2, Excavation and Offsite Disposal, Alternative 3, Manage In-Situ, With Monitoring, Maintenance (for Army BRAC sites) and Alternative 4, Manage On-Site, With Monitoring, Maintenance (for Army Civil Works Issues) as shown in Table ES-3. These recommendations will allow the transfer of the site and implementation of its reuse as open space for wildlife habitat restoration and wetland restoration use. If the Hamilton Wetland Restoration Project (HWRP) does not proceed or is not completed, then this ROD/RAP may be reopened to address environmental actions for other land uses. These recommendations are based on the following:

- For Alternative 1 sites, soil contamination was not identified or was identified at levels that do not pose significant risk to human health or the environment or at levels that are

not greater than the Action Goals. At some sites, contaminated soil was removed during interim removal activities and the confirmation sampling was used to for this evaluation.

- For Alternative 2 sites, soil contamination was identified at levels that pose a significant risk to human health or the environment.
- For Alternative 3 sites, soil contamination was identified at levels that do not pose significant risk to human health or the environment as long as the specified performance criteria are met during the implementation of the Hamilton Wetland Restoration Project. If the performance criteria cannot be met, then the soils are required to be excavated and disposed of offsite.
- For Alternative 4 sites, Inboard Area-wide DDTs and PAHs along the runway were identified at levels that do not pose significant risk to human health or the environment as long as the specified performance criteria are met during the implementation of the Hamilton Wetland Restoration Project. If the performance criteria cannot be met, then the soils require excavation and movement to a location on the parcel where the performance criteria can be met.
- Groundwater data to date supports the conclusion that no further action is necessary with respect to groundwater.

Statutory Determinations

The selected remedies for the Main Airfield Parcel are protective of human health and the environment; attain federal and state requirements that are applicable, or relevant and appropriate; are permanent and cost-effective; and are compatible with the proposed future use of the Main Airfield Parcel for wetland restoration and continued salt marsh habitat. Because hazardous substances could remain on site where Alternative 3 is selected, a 5-year review will be required.

Data Certification Checklist

The following information is included in this ROD/RAP as part of the decision summary:

- Chemicals of concern and chemicals of potential concern
- Types of contaminants found at the sites
- Action goals established for chemicals of concern and chemicals of potential concern
- The basis for the action goals
- Assumptions used in the risk assessment
- Current and future land use

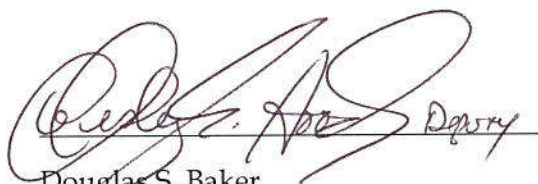
Additional information can be found in the Administrative Record for the Main Airfield Parcel.

California Environmental Quality Act (CEQA) Coordination

The Department of Toxic Substance Control and the California State Coastal Conservancy jointly prepared a Subsequent Environmental Impact Report (SEIR). The SEIR evaluates impacts from the ROD/RAP alternatives that are being selected.

Authorizing Signatures

This document was developed by the United States Department of the Army, in cooperation with the California Department of Toxic Substances Control and the California Regional Water Quality Control Board. Through their involvement, these agencies accept and support this ROD/RAP and have ensured that it meets federal and state regulatory requirements.



Douglas S. Baker

COL, U.S. Army

Chief, Base Realignment and Closure Division

8/02/03

Date



Anthony J. Landis, P.E.

Chief, Northern California Operations

Office of Military Facilities

Site Mitigation Branch

Department of Toxic Substances Control

9-12-03

Date



Loretta Barsamian

Executive Officer

California Regional Water Quality Control Board

San Francisco Bay Region

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Date